



**Solutia Inc.**  
575 Maryville Centre Drive  
St. Louis, Missouri 63141

December 18, 2001, 2001  
(Via certified or express mail)

P.O. Box 66760  
St. Louis, Missouri 63166-6760  
Tel 314-674-1000

Kevin Turner-Environmental Scientist, OSC  
U. S. Environmental Protection Agency  
c/o Crab Orchard National Wildlife Refuge  
8588 Rt. 148  
Marion, IL 62959

Thomas Martin  
Associate Regional Counsel  
77 West Jackson Boulevard (C-14J)  
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)  
Sediment / Soils Removal Action**  
• # 7 - December 2001 Monthly Report

Dear Mr. Turner and Mr. Martin,

Enclosed is the December 2001 Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") sediment removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Light", is written over the typed name.

D. M. Light  
Manager, Remedial Projects  
Solutia Inc.

cc:

Michael Ribordy - USEPA Region 5  
Sauget File - Solutia  
S. Bron - IEPA  
Mayor D. Reed - Cahokia  
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)

Mike Henry - IDNR  
Kevin de la Bruere - USF&G  
Mayor P. Sauget - Sauget, IL

## **Sauget Sites Area I - Sauget, Illinois**

### **May 31, 2000 UAO – Dead Creek Sediment Removal Action**

#### **Monthly Report**

**Date of Report:** December 18, 2001  
**Period Covered:** November 1, 2001 – November 30, 2001  
**Next Report Period:** December 1, 2001 – December 31, 2001

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#### **Background**

A Unilateral Administrative Order (“UAO”) was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan (“TCRAWP”) was initially submitted to the Agencies June 30, 2000 for review and approval. Agreements sufficient to proceed with issuance of a request for bids for the containment cell construction were reached in December, 2000. Bids were received in late January and evaluated in February 2001.

Fieldwork began on the sediment de-watering phase of the project in November 2000. Installation of the required facilities (piping, pumps, basins, etc.) to de-water the sediments while the containment cell is being constructed was completed and started up in February, 2001. Operation of these facilities will continue until all sediments are placed into the containment cell.

Subject to the inclusion of all comments and agreed upon revisions, approval of the containment cell design by U. S. EPA was received March 5, 2001. A contract for construction of the containment cell was awarded March 8, 2001 to LMS Environmental Contracting, Inc. (“LMS”). Placement of fill for the Containment Cell berms began April 23, 2001. A March 30, 2001 revised draft containment cell design was approved by the Agencies in a May 10, 2001 letter. Construction was completed on the Containment Cell on September 13, 2001. A draft Containment Cell Certification Report was submitted for Agencies’ review and approval upon construction completion. The Containment Cell was approved on September 24, 2001 by USEPA and IEPA for receipt of sediment. Placement of sediments into the cell began September 26, 2001.

An Amendment to the UAO was received October 29, 2001. The Amendment modified the project scope of the UAO – adding Creek Sector F sediments removal and placement into the Containment Cell.

## **Agency Actions / Communications**

- Revision 01 Draft Groundwater Monitoring Plan - submitted to the Agencies August 3, 2001 – remained under review.
- The Operations and Maintenance Report - submitted for Agencies' review and approval August 28, 2001- remained under review. Portions of the Plan applicable to the placement of sediments have already been approved.
- On August 20, 2001, Solutia requested a change in the Post Removal Confirmation Sampling and analytical protocols. In a November 30, 2001 communication, the Agency responded with revised sampling and analytical protocols.

## **Work Performed during the reporting period**

- Completed sediment removal from Creek Segments B and C and placement into the Cell. Completed installation of a temporary geotextile/poly sheeting cover in Segment B. This completes all sediment removal required under the original scope of the Order.
- Continued sediment dewatering activities and maintenance of dewatering pumps.
- Processed approximately 230,000 gallons of stormwater through the onsite treatment system.
- Sampled sediments being placed in the containment cell as required by the approved Work Plan.
- Completed screening sediments for placement against containment cell slopes.

## **Data Submittal**

No data is submitted with this report.

## **Work scheduled for next reporting period**

- Begin Creek Sector F work: clearing and grubbing; setup of the dewatering system; and sediment removal.
  - Begin post sediment removal sampling of the creek.
  - Continue operation of the stormwater treatment system on an as needed basis.
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## **PROJECT COMPLETION**

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Creek Sediment Excavation	100 %
Cover Installation	0 %
Demobilization	0 %
Final Report Preparation	0 %

### **Problems and Solutions**

None

### **Submittal Schedule Status**

See attached UAO schedule

### **Issues under review**

None

### **Comments**

None

## May 31 Sauget Area I UAO Sediment Removal Action

### SCHEDULE

<b>Deliverable</b>	<b>Description</b>	<b>Due Date</b>
Issuance Date	Date UAO signed by Muno	<b>31-May-00</b>
Effective Date	10 business day after issuance	<b>14-Jun-00</b>
Notice of Intent to Comply	3 business days after effective date	<b>19-Jun-00</b>
Designation of Contractor and Project Coordinator	5 business days after effective date	<b>21-Jun-00</b>
Access	14 calendar days after effective date	<b>28-Jun-00</b>
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	<b>7-Jul-00</b>
EPA Approval of TCRA W/P		<b>May 10, 2001</b>
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	<b>June 10, 2001</b>
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	